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March 7, 2018

Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex parte* presentation in IB Docket No. 11-109

Dear Chairman Pai:

I thought you might find of interest the attached op-ed published yesterday by former Sen. John E. Sununu regarding Ligado Networks' co-existence with GPS.

Please direct any questions to the undersigned.

Sincerely,

/s/

Gerard J. Waldron
Counsel to Ligado Networks LLC

cc: Rachael Bender

Attachment

<http://thehill.com/opinion/technology/376730-setting-the-record-straight-on-ligado-and-gps>



Setting the record straight on Ligado and GPS

By Former Sen. John E. Sununu
March 6, 2018



With 5G wireless technology set to dramatically revamp the American economy, it's easy to be excited about the future. But last week's op-ed in The Hill with claims of "a grave threat to GPS" was, sadly, stuck in the past.

Its authors provided incorrect information to readers, using outdated figures and omitting information about dramatic changes under way in the telecommunications marketplace, all in order to disparage Ligado's proposal to deploy its spectrum to support America's critical infrastructure industries.

Most significantly, the authors' suggestion that Ligado's proposal would harm GPS is a complete fallacy.

Here's the reality: Five of the largest GPS manufacturers have said they are not opposed to Ligado's spectrum proposal. Ligado worked directly with each company over the past two years to find a path forward that meets their needs. In December 2015, Ligado entered into concrete settlement agreements with Garmin and John Deere, after which Garmin stated it "doesn't anticipate any performance-degradation issues." And in 2016, Ligado entered into additional agreements with Trimble, NovAtel, and Topcon — with the latter noting, "We look forward to coordinating with Ligado over the coming years as it deploys a ground network."

These agreements were a result of Ligado going to great lengths to develop a plan that ensures GPS receivers are protected.

The authors also claimed that Ligado's plan would undermine first-responder helicopter operations and disrupt high-precision GPS receivers. Wrong again. In fact, Metro Aviation, a leading air medical transport company, told the FCC that Ligado's operations would not interfere with its systems. This proposal has the support of two top manufacturers of high-precision GPS equipment. Moreover, Ligado's planned customized networks for the industrial sector would enable customers to take advantage of location services with centimeter-level accuracy.

The authors simply ignored these facts and grossly distorted what Ligado has proposed. Ligado is not planning to become a national telecommunications provider with 40,000 towers. Instead, the company has asked the FCC to use the spectrum for new, targeted networks that will help America's industrial sector take advantage of 5G and the "internet of things" — a fact presented to the authors by Ligado in November. More critically, the authors also ignored volumes of data and thousands of hours of testing collected and analyzed in 2016 at government labs in Colorado.

This testing was developed and executed by our nation's top scientists and engineers and shows that GPS devices of all kinds can co-exist with Ligado's services, or be readily adapted to do so. For some reason, the authors have chosen to ignore all of these facts, erroneously creating an attention-grabbing headline.

As an engineer and former member of the Senate Commerce and Homeland Security Committees, I know firsthand how innovative technology can strengthen our economy and improve national security. I also know what happens when politics get in the way. Ligado should be proud of the compromises made with the GPS industry to ensure a spectrum environment that works for everyone.

I've worked closely with Ligado's team for the past year, and over that time, have witnessed their commitment to resolve issues, find compromise and develop plans that advance U.S. infrastructure. They have dramatically reduced operating power levels, relinquished spectrum to create a wide guard band for GPS, and coordinated with the industry to show that these technologies can readily coexist.

I recognize disagreements are a routine part of Washington policymaking. But it's one thing to have an honest debate based upon facts; it's another to make allegations based on outdated and incorrect information. The truth is that this new proposal has been under review for over two years by officials at cabinet-level agencies. They have worked to conduct a thorough and objective review, and we ought to have confidence in them to do their jobs.

As the FCC gets closer to acting on Ligado's spectrum plan, let's hope that discussion will focus on details in the record and what's actually being proposed. With so much opportunity for investment and job creation on the line, it's worth getting the facts right.

John Sununu represented New Hampshire in the U.S. Senate from 2003-2009; he previously served in the U.S. House of Representatives from 1997-2003. He is a board director for several companies and advises clients, including Ligado Networks, on public policy and technology matters.